TOWSON UNIVERSITY, MARYLAND MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PROGRAM INSPECTION REPORT

Final Report Date: February 18, 2014

Field Activity Dates: November 7–8, 2013

U.S. Environmental Protection Agency, Region III
Water Protection Division
Office of NPDES Enforcement (3WP42)
1650 Arch Street
Philadelphia, PA 19103

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DOCUMENTS CITED IN REPORT

Shortened Name	Document Title and Date
EPA Records Request	List of documents that the EPA Inspection Team requested from the University on September 27, 2013
Permit	*National Pollutant Discharge Elimination System General Permit for Discharges from State and Federal Small Municipal Separate Storm Sewer Systems, General Discharge Permit No. 05-SF-5501 (General NPDES Permit No. MDR055501), effective April 14, 2003*
University Response Inventory	Inventory of documents provided by the University in response to the EPA Records Request

ACRONYMS AND ABBREVIATIONS USED IN REPORT

Abbreviation	Corresponding Term
BMP	best management practice
CGP	construction general permit
COMAR	Code of Maryland Regulations
EH&S	Environmental Health & Safety
EPA	[United States] Environmental Protection Agency
ESD	environmental site design
IDDE	illicit discharge detection and elimination
MDE	Maryland Department of the Environment
MEP	maximum extent practicable
MOU	memorandum of understanding
MS4	municipal separate storm sewer system
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SOP	standard operating procedures
SWPPP	stormwater pollution prevention plan

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Permit Requirement	Observations
Permit Section III. (MS4 Program Implementation)	Observation 1. The University was able to demonstrate that some aspects of an MS4 program have been implemented but was not able to demonstrate that a comprehensive MS4 program had been developed or implemented.
	Observation 2. The University was not engaged in a MOU with any other government entity to satisfy one or more of the minimum control measures in Part III or IV of the Permit.
Permit Section III.A. (Personnel Education and Training)	Observation 3. University representatives explained that a formal education/training program for University faculty, staff, and students, as required by the NOI, had not been developed.

EXECUTIVE SUMMARY

From November 7 through 8, 2013, a compliance inspection team composed of staff from the U.S. Environmental Protection Agency (EPA) Region III and EPA's contractor, PG Environmental, LLC, (collectively the EPA Inspection Team) inspected the municipal separate storm sewer system (MS4) program of Towson University located in Towson, Maryland (hereinafter, the University).

The purpose of this inspection was to obtain information that will assist EPA in assessing the University's compliance with the requirements of the Permit, as well as the implementation status of its current MS4 program.

Based on the information obtained and reviewed, the EPA Inspection Team made several observations concerning the University's MS4 program related to the specific Permit requirements evaluated. Table 1 below summarizes the permit requirements and the observations made by the inspection team.

Table 1. Summary of Permit Requirements and Inspection Observations

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INTRODUCTION

From November 7 through 8, 2013, a compliance inspection team composed of staff from the U.S. Environmental Protection Agency (EPA) Region III and EPA's contractor, PG Environmental, LLC, (collectively the EPA Inspection Team) inspected the municipal separate storm sewer system (MS4) program of Towson University (University or Permittee) in Towson, Maryland. Discharges from the University's MS4 are regulated by the Maryland Department of Environment (MDE) *General Permit for Discharges of Stormwater from State and Federal Small Municipal Separate Storm Sewer Systems,* General Discharge Permit No. 05-SF-5501 (General National Pollutant Discharge Elimination System (NPDES) Permit No. MDR055501; hereinafter, the Permit), effective November 12, 2004. The Permit expired November 12, 2009, but has been extended by MDE until a new permit is issued. A copy of the Permit is included as Attachment 1. A copy of the University's original MS4 Notice of Intent (NOI), which contains descriptions of measures for program compliance, is included as Attachment 2.

The purpose of this inspection was to obtain information that will assist EPA in assessing the University's compliance with the requirements of the Permit, as well as the implementation status of its current MS4 program. The inspection schedule is presented in Attachment 3.

The EPA Inspection Team obtained its information through a series of interviews with representatives from the University, along with a series of site visits, record reviews, and field verification activities. The primary representatives involved in the inspection were the following:

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For a more complete list of inspection participants, please refer to the sign-in sheets in Attachment 4.

TOWSON UNIVERSITY BACKGROUND

The University has been developing and implementing its MS4 program since 2005. Authorization was given to the University under the MDE general permit on March 4, 2005. The expiration date of the MDE general permit was November 12, 2009. The MDE general permit has been administratively extended . At the time of the inspection, the University was in MS4 Permit Year 9 (i.e., October 2005 to November 2013).

The University encompasses approximately 328 acres within the Jones Falls watershed, and the total student population of the University is about 22,000 people. The University's MS4 discharges to Towson Run as well as to tributaries of Towson Run, including Glenn Glen Creek.

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INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

During the inspection, the EPA Inspection Team obtained documentation and other supporting evidence regarding compliance with the Permit. Pertinent information may have been obtained prior to, and/or after, meeting with University staff during the physical inspection and is presented in this report as observations. The presentation of inspection observations in this report does not constitute a formal compliance determination or notice of violation.

All referenced documentation used as supporting evidence is provided in Attachment 5, Exhibit Log, and photograph documentation is provided in Attachment 6, Photograph Log.

Before the inspection, the EPA Inspection Team formally requested that the University have specific documentation available for review at the time of the inspection. The EPA Inspection Team provided the University with a written list of requested records on August 27, 2013 (EPA Records Request; see Attachment 5, Exhibit 1). The University made numerous documents available to the EPA Inspection Team during the inspection.

The report below describes and outlines Permit requirements with specific sections cited, the related requirements, and observations made during the inspection. The format of the report follows the numeric system used in the Permit and is sequential. Sections of the Permit are restated with the observations concerning those requirements listed below.

Wet weather conditions were experienced on Thursday, November 7, and the EPA Inspection Team experienced dry weather on Friday, November 8.

OVERALL PROGRAM IMPLEMENTATION

Permit Requirement	Observations
Permit Section III. (MS4 Program Implementation)	Observation 1. The University was able to demonstrate that some aspects of an MS4 program have been implemented but was not able to demonstrate that a comprehensive MS4 program had been developed or implemented.
Permit Section III.A. (Personnel Education and Outreach)	Observation 2. The University was not engaged in a MOU with any other government entity to satisfy one or more of the minimum control measures in Part III or IV of the Permit. Observation 3. University representatives explained that a formal education/training program for University faculty, staff, and students, as required by the NOI, had not been developed.
Permit Section III.B. (Personnel Education and Outreach)	Observation 4. The University was not able to demonstrate that they have scheduled and promoted annual stream monitoring of Towson Run.

Permit Section III. (Minimum Control Measures) – The Permit requires that the University implement the six minimum control measures served by their small MS4. Each agency covered by this general permit shall determine how each minimum control measure will be implemented. Permittees must define appropriate best management practices (BMPs) and develop measurable goals for each measure. Permit Section III. also requires the University to implement the six minimum control measures in the area served by their small MS4 and suggests that a permittee enter into a legally binding contract, memorandum of understanding (MOU), or other similar means to avoid conflicts resulting from noncompliance.

Observation 1: The University was able to demonstrate that some aspects of an MS4 program have been implemented but was not able to demonstrate that a comprehensive MS4 program had been developed or implemented.

According to University representatives, the University did not have a dedicated stormwater budget or funding to administer the MS4 program (i.e., fund programs or staff). In addition, there was not a comprehensive plan to coordinate the activities or to ensure that the activities were conducted.

The University was able to provide staff and faculty who were knowledgeable about certain activities required by the Permit. However, many of those activities were essentially being conducted for reasons other than meeting the requirements of the MS4 permit.

The EPA Inspection Team suggested that the University develop written and formal protocols and plans to clearly explain the actions and activities performed by the University for its MS4 program. The EPA Inspection Team also suggested the University staff should develop protocols explaining how documenting their actions, including inspections, would help the University better implement its program.

The EPA Inspection Team suggested the development of a steering committee to foster collaboration among University EH&S, Facilities Management, administration, and academic staff. It was apparent throughout the discussions that the University has the opportunity to include a wide range of participants, including University faculty, staff, and students.

The EPA Inspection Team further suggested that a comprehensive training and education program would help ensure that all University faculty, staff, and students are aware of the MS4 program and the proper departments to contact with issues.

Observation 2: According to the Permit, the University may enter into a MOU with any other government entity to satisfy one or more of the minimum control measures in Part III or IV of the Permit. At the time of the inspection, the University had not engaged into an MOU with any other government

entity with regards to implementing the minimum controls of the Permit. The EPA Inspection Team suggested that the University evaluate the benefits of potentially entering into an MOU, or other legally binding agreement, with Baltimore County for the shared services within and adjacent to the University. The MOU might facilitate collaboration between the two permittees and establish a legal authority for interconnections of the storm sewer system.

MINIMUM CONTROL MEASURE 1: PERSONNEL EDUCATION AND OUTREACH

Permit Section III.A. (Personnel Education and Outreach) – The Permit requires the University to, at a minimum, provide a personnel education program that contains information about the impacts of stormwater discharges on receiving waters, why controlling these discharges is important, and what the personnel can do to reduce pollutants in stormwater runoff.

Observation 3: Section A.1 of the University's NOI states that the University will do the following: "Use agency's citizens and provide links to sites with extensive nonpoint source pollution information," and "Develop a website banner to advertise agency's stormwater program from time to time." University representatives explained that a formal education/training program for University faculty, staff, and students, as required by the NOI, had not been developed.

EH&S staff explained that the University had two types of training that touched on stormwater. University representatives stated that training was targeted to University staff who dealt with hazardous wastes and entailed a one-time hazardous waste generator training, which included a number of slides related to stormwater, illicit discharges, and spills. EH&S staff explained that the training was provided periodically and that employees signed up for the training as their schedules allowed. Staff stated that not all employees received the training and that refresher training was not offered. University representatives additionally provided an "Employee Safety Programs" document containing a stormwater section which defines an MS4 and discusses the Phase II program, impervious area, and illicit discharges. Staff explained that newly hired employees are required to sign forms stating that they have read the document.

During site visits to University construction projects, University construction project managers stated that they had not been trained on stormwater topics except for erosion and sediment controls at the construction sites. The University construction project managers were not aware of what illicit discharges were or who should be contacted if an illicit discharge was identified. One University construction project manager initially stated that he would contact MDE in such cases, but then stated that he would contact the University's EH&S staff.

The Interim Director of the Environmental Science Program stated that four courses taught at the University contained topics pertaining to stormwater: (1) 100-level undergraduate chemistry, (2) 100 level undergraduate biology, (3) senior-level toxicology , and (4) graduate-level environmental science.

In addition, the Interim Director of the Environmental Science Program explained that the University-issued "Towson Tiger Today," or "T3," a weekly online publication, sometimes touched on stormwater topics (e.g., stream cleanups). An example "T3" publication that touched on a stormwater topic (e.g., stream cleanup in 2006) is attached (see Attachment 5, Exhibit 2). The 2006 "T3" publication was the latest documented stream cleanup example provided to the EPA Inspection Team. Attached is an email from the Coordinator for Community Services. As indicated, the university holds Adopt-A-Campus clean-up days annually. Per the email, stream cleanouts occurred in October, 2012 and April, 2014. I included exact dates on my email. Finally, a student organization called Students for Environmental Awareness has regular meetings and organizes stream cleanups. The Director of EH&S explained that the EH&S Department was not directly involved with coordinating the above-mentioned efforts and did not track the efforts to ensure the frequency of the cleanups, the course curriculum, or the "T3" content.

MINIMUM CONTROL MEASURE 2: PUBLIC INVOLVEMENT AND PARTICIPATION

Permit Section III.B. (Public Involvement and Participation) – The Permit requires the University to implement and maintain a public involvement and participation program. Section III.B. of the Permit also requires the University, at a minimum, to comply with all state and federal public notice requirements in actions or decisions having to do with stormwater management.

Observation 4: Section B.1 of the University's NOI states that the University "shall schedule and promote an [sic] restoration activity such as stream monitoring, storm drain stenciling, or streamside tree plantings." The "Measureable Goals" section of the University's NOI states that the University must "schedule and promote annual stream monitoring of Towson Run stream on campus" in year 1 and "identify & stencil campus stormwater drains" in year 2.

The University was not able to demonstrate that they have scheduled and promoted annual stream monitoring of Towson Run. As previously noted, the 2006 "T3" publication was the latest documented example of a stream cleanup provided to the EPA Inspection Team. Attached is an email from the Coordinator for Community Services. As indicated, the university holds Adopt-A-Campus clean-up days annually. Per the email, stream cleanouts occurred in October, 2012 and April, 2014. I included exact dates on my email

In addition, University representatives stated that storm drain stenciling had not occurred. Incorrect. Storm Drain stenciling had been accomplished on virtually (99%) of all storm drain inlets on campus. However, the EPA Inspection Team observed stenciling at a drain near the Towsontown Garage that included the phrase "No Dumping- Drains to Bay" during the Outfall Site Visits, described in Observation 10. (see Attachment 6, Photograph 1.)

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

Permit Section III.C. (Illicit Discharge Detection and Elimination) – The Permit requires the University to develop, implement, and enforce a program to detect and eliminate illicit discharges into the MS4.

Permit Section III.C.1. – The Permit requires the University to develop and implement a map showing the extent of the storm sewer system.

Observation 5: Section C of the University's January 13, 2005 NOI states that the University will (a) create a map of the facility and all water resources and (b) verify and map inspected outfalls on the facility's water resources map. University representatives stated that a map showing the extent of the storm drainage system had not been developed. University staff provided several maps that contained components of the drainage system (e.g., underground stormwater management facilities, outfalls, etc.); however, a map or set of maps displaying the storm sewer piping and other aspects of the University's system had not been developed. A draft version of a map titled "Outfall Locations DRAFT" (hereinafter University's Outfall Map; see Attachment 5, Exhibit 3) and dated 2006 only indicates outfalls, not the storm drainage system (i.e., conveyances owned by the University for collection and transportation of stormwater). Staff stated that updates to the map had not been made since 2006. Additionally, during field activities the EPA Inspection Team observed that at least three of the six outfalls visited were either incorrectly shown on the map or had been removed.

Permit Section III.C.2. – The Permit requires the University to, at a minimum, develop and implement the legal means to provide for entering onto private property to investigate and eliminate illicit storm drain system discharges.

Observation 6: University representatives stated that the University had not developed written procedures or protocols explaining the University's legal authority in regards to illicit discharges, or how to convey this information to faculty, staff, and students. The University has, however, prepared two documents that touch on legal authority. Towson University staff explained that the *Towson University Police Department Manual of General Directives* (see Attachment 5, Exhibit 4) explains that University-employed police officers have the authority to make arrests and to issue civil and criminal citations within the geographic limits of the University. Guidance for police officers pertaining to spills or illegal discharges is not included in this document. Towson University staff further explained that the University also has *University Policies and Procedures* (see Attachment 5, Exhibit 5) and a *Code of Student Conduct* (see Attachment

5, Exhibit 6) that provide guidelines on University employee and student behavior.

Permit Section III.C.3. – The Permit requires the University to, at a minimum, develop procedures to field screen stormwater outfalls on a consistent basis in support of the IDDE program.

Observation 7: Section C of the University's January 13, 2005 NOI states that one of the University's IDDE measurable goals is to annually inspect 10 percent of the University's outfalls per MDE's visually/olfactory inspection sheet.

University representatives explained that a field screening and survey of stormwater outfalls had been conducted for the University by a consulting firm from 2005 to 2006. Information documenting these activities is included in the document titled *National Pollutant Discharge Elimination System Permit Information* (see Attachment 5, Exhibit 7) dated February 2007. Section 2.3.3 (Field Screening Investigation) of the document indicates that all 52 identified outfalls were field screened for illicit discharges and that Towson University will perform, at a minimum, an annual outfall inspection. University staff stated that field screening had not been conducted since the 2006 activities. Staff provided a draft document titled "D-R-A-F-T Procedures for Field Screening of Stormwater Outfalls" (see Attachment 5, Exhibit 8) dated November 1, 2013 (after the date that EPA notified the University of the inspection), but stated that the procedures had not yet been implemented and that training on the procedures had not been provided to University staff.

Permit Section III.C.4. – The Permit requires the University to, at a minimum, develop a program containing inspection procedures for identifying the source of any suspected illicit discharges to the storm drain system and procedures to address spills and illegal dumping.

Observation 8: University representatives stated that they did not have written standard operating procedures (SOPs) or a specific plan for identifying illicit discharges. University representatives stated that they typically dealt with illicit discharges and spills on a reactionary basis and that University staff, such as landscaping crews, looked for illicit discharges while conducting their regular activities.

University representatives explained that faculty, staff, and students have access to the University's *Emergency Resource Guide* containing emergency numbers for various situations. They are directed to use the guide if they identify an illicit discharge. Staff explained that the guides are located in classrooms on campus and with University faculty and staff. Staff stated that the guide contained the correct contacts in cases of illicit discharges or spills; however, it had not been updated since 2007. Incorrect. The Emergency Resource Guide (ERG) was revised in July, 2012 including emergency/important phone numbers.

University representatives provided the EPA Inspection Team with "D-R-A-F-T Recommended Procedures for Reporting Campus Environmental

Spills" dated November 1, 2013 (after the date that EPA notified the University of the inspection), which they stated would be included in the University's *Emergency Resource Guide*. University representatives explained that training had not been conducted related to the procedures, but that various University staff knew to go to the *Emergency Resource Guide* to find the proper department to contact. The University maintains a 24-hour hotline to which students, faculty, and staff may report emergencies, including spills or illicit discharges.

The EPA Inspection Team learned that two illicit discharges/spills had been recorded since the University had become regulated under the Permit. One involved a sewage spill and was reported by Facilities Management, and the second involved an oil and grease spill and was initially reported by students. It was unclear how students reported the oil and grease spill to the University, whether the book of emergency contacts was used, and if the incident was quickly routed to EH&S for response. Documentation of the event was not provided to the EPA Inspection Team.

University representatives stated that a central system to document reports of spills or illicit discharges did not exist and that the documentation regarding the details of the aforementioned events was exclusively maintained via email by EH&S staff.

Permit Section III.C.5. – The Permit requires the University, at a minimum, to develop and implement enforcement and penalty procedures.

Observation 9: University representatives explained that the University did not have a document that explicitly stated enforcement and penalty procedures, but that information is provided in three separate documents.

1. As stated above, the *Towson University Police Department Manual of General Directives* (see Attachment 5, Exhibit 4) provides authority to University police officers to make arrests and to issue civil and criminal citations, but does not include guidance pertaining to spills or illegal discharges.

2. The *University Policies and Procedures* (see Attachment 5, Exhibit 5) contains policies that describe unacceptable personal conduct for University employees and dictates types of disciplinary actions; however, conduct specific to illicit discharges or other polluting activities is not specifically addressed.

3. The University's *Code of Student Conduct* (see Attachment 5, Exhibit 6) explains disciplinary procedures for misconduct, including actions that range from censure to suspension and expulsion. While stormwater is not specifically mentioned, the document states that intentionally or recklessly damaging, destroying, defacing or tampering with University or private property is prohibited.

The EPA Inspection Team suggested that the University examine how best to incorporate stormwater and illicit discharge prohibitions into each of these documents. The EPA Inspection Team additionally suggested that the University develop a document that explains the University's overall procedures for penalties and enforcement.

Outfall Site Visits Conducted as a Component of the Inspection – On November 7, 2013 the EPA Inspection Team conducted site visits at multiple outfalls to Towson Run and Glen Creek (a tributary to Towson Run) within the jurisdictional boundaries of the University.

The purpose of the visits was to assess the University's mapping of MS4 outfalls, to survey select outfalls for illicit discharges, and to discuss the University's SOPs regarding outfalls. During the site visits, the EPA Inspection Team walked stream banks with University representatives. Because of their relevance to the University's obligations for IDDE under its MS4 permit, summary observations pertaining to the outfall visits at Towson Run and Glen Creek are presented below.

Observation 10: University MS4 Outfall Reconnaissance – Towson Run and Glen Creek (November 7, 2013)

Towson Run flows from the northeast corner of the campus to the northwest corner. As stated above, the EPA Inspection Team was presented the University's Outfall Map dated 2006 (see Attachment 5, Exhibit 3). Staff stated that the map had been developed as part of a field screening and survey of stormwater outfalls conducted for the University by a consultant. Staff stated that the map had not been updated and that a number of structural changes had been made to the University's MS4 since that time.

The EPA Inspection Team visited three areas on campus: (1) the northeast corner, near the Residence Tower and the Towsontown Garage, (2) the central portion of campus referred to as "The Glens," and (3) the northwest area of campus near Barton House and Douglas House.

The EPA Inspection Team observed the following with regard to MS4 outfalls on campus:

a. Towson Run flows onto campus from Baltimore County in the northeast corner of campus (see Attachment 6, Photographs 2 and 3).

b. The University's Outfall Map shows a number of outfalls, labeled TU – 003, 004, 005, and 006, downstream of Towson Run's entrance onto campus. These outfalls were not observed during the site visit and University staff stated that the outfalls had most likely changed since the map had been created. University staff stated that they were unsure if an outfall underneath the Towsontown Garage was draining University property and stated that it appeared to be an outfall to the stream from Towsontown Boulevard in Baltimore County's

jurisdictional area (see Attachment 6, Photograph 4) and therefore was not contained on the map.

c. Glen Creek flows through "The Glen" area of campus and is then conveyed underground (see Attachment 6, Photograph 5) until its convergence with Towson Run to the north. The EPA Inspection Team observed one outfall along the stream that was later identified as TU – 051 using the University's Outfall Map (see Attachment 5, Exhibit 3 and Attachment 6, Photograph 6). TU – 028 and TU – 029, located close to TU – 051 and TU – 030, both shown on the University's Outfall Map, could not be located during the field activity.

d. An MS4 outfall to Towson Run was observed in the area of Barton House and Douglas House on the northwest side of campus (see Attachment 6, Photograph 7). This appeared to be near the location of TU – 034 and TU – 035 identified on the University's Outfall Map; however, the outfall observed did not match either of the photographs for these outfalls shown in the University's Outfall Map (see Attachment 5, Exhibit 3). University staff stated this area had been redeveloped since the inventory had been conducted and that the outfalls had most likely been altered.

e. An MS4 outfall was observed in the northwest corner of the campus flowing from a stormwater management facility (i.e., pond) near Gillcrest Hospice Center to Towson Run. This outfall is identified on the University's Outfall Map (see Attachment 5, Exhibit 3) as TU – 052 (see Attachment 6, Photographs 8 through 12). University representatives were unsure whether this pond was actually owned by the University and stated that it might be owned by the Gillcrest Hospice Center, which is located south and up the hill from the pond.

MINIMUM CONTROL MEASURE 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM

Permit Section III.D. (Construction Site Stormwater Runoff Control) – The Permit requires the University to adhere to Maryland Environment Article, Title 4, Subtitle 1, Annotated Code of Maryland, which establishes a statewide erosion and sediment control program to control construction site stormwater runoff. This statute, coupled with the Code of Maryland Regulations (COMAR), specifies the requirements for any construction activity that disturbs five thousand (5,000) square feet or more of earth.

COMAR 26.17.01.02 states that an acceptable erosion and sediment control program will include 1) an effective erosion and sediment control ordinance or an effective set of erosion and sediment control regulations, which has been approved by the Water Management Administration; 2) review and approval of erosion and sediment control plans in accordance with the *2011 Maryland Standards and Specification for Soil Erosion and Sediment Control*; 3) requirements for erosion and sediment control plans to provide effective erosion and sediment control strategies (i.e., BMPs) and information necessary to enable the proper installation and

maintenance of these strategies; and 4) inspection and enforcement procedures (in delegated jurisdictions) that ensure compliance with the approved erosion and sediment control plan, as well as provide for timely response to citizen complaints. Further, COMAR 26.17.01.11 states that the *2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control* is incorporated by reference by the Administration, and shall serve as the official guide for erosion and sediment control principles, methods, and practices.

Towson University had not been delegated the erosion and sediment control program by MDE. Therefore, the Permit's only substantive requirement is for the University to submit its erosion and sediment control plans to the Water Management Administration (i.e., MDE).

Permit Section III.D. – The Permit requires the University to comply with all state and federal laws, regulations, ordinances, and procedures relating to erosion and sediment control.

Observation 11: The EPA Inspection Team interviewed two of the University's construction project managers at two campus construction projects, and both stated that they were unsure whether the construction projects they were managing qualified for coverage under MDE's construction general permit (CGP), or if the University's contractor had been granted coverage for the projects.

University construction project managers stated that they did not typically perform reviews of project documents to ensure University contractors had obtained coverage under MDE's CGP, if required, and were in compliance with the permit (e.g., conducting routine inspections).

Construction Site Visits Conducted as a Component of the Inspection – On November 7, 2013 the EPA Inspection Team conducted site visits at two University-owned and operated construction sites within the jurisdictional boundaries of the University: (1) Sight and Safety Phase II Project, and (2) Health and Counseling Center project. Wet weather conditions were experienced immediately prior to the inspection activities.

The purpose of the visits was to assess the University's oversight activities for construction sites. During the site visits, the EPA Inspection Team walked the construction sites with University representatives, including the University construction project managers tasked with managing the University's contractors. Because of their relevance to the University's obligations for construction site stormwater runoff control under its MS4 permit, summary observations pertaining to the two site visits are presented below.

Observation 12: Sight and Safety Phase II Project (November 7, 2013)

The Sight and Safety Phase II construction project (MDE CGP Permit No. 13SF0060) is located at the intersection of Towsontown Boulevard West and Osler Drive. The project consists of the construction of a walkway over Osler Drive from the west to the east, an athletic field and the underground channelization of Towson Run in the area. According to the University construction project manager, construction started around May 2013 and is scheduled to be completed by spring 2014. At the time of the

site visit, a majority of the site was disturbed and the structure covering Towson Run was almost complete.
According to the University construction project manager, stormwater from the site enters several onsite storm drains, which discharge to Towson Run. In addition, stormwater can enter the creek directly from the banks of Towson Run, which are protected by silt fence.

The University construction project manager explained that he typically visits the site daily to review construction activities. He further explained that erosion and sediment controls are one aspect of his responsibilities, as he is responsible for all aspects of construction activities (e.g., schedule, buildings, utilities, etc.). The construction project manager stated that he typically does a daily site walk but that he may not review all areas where erosion and sediment controls are located. He also stated that he does not regularly document his site walk findings and that he primarily conveys erosion and sediment control issues to the site contractor verbally. He further stated that he does not conduct reviews to ensure that a site has properly obtained permit coverage under MDE's CGP, or whether the site is in compliance with the requirements of MDE's CGP (i.e., regular inspections).

The EPA Inspection Team observed the following with regard to erosion and sediment controls at the University construction site and verbally reviewed the observations with University representatives during the site visit:

a. Tracking was noted from the construction entrance onto Osler Drive (see Attachment 6, Photographs 13 and 14).

b. A temporary sedimentation pond was observed in the southern portion of the site (see Attachment 6, Photographs 15 and 16).

c. Towson Run had been permanently covered by a Contech vault system (see Attachment 6, Photographs 17 and 18).

d. An assortment of chemicals (i.e., coatings, waterproofing chemicals, primer, and joint lubricants) was observed stored throughout the project without BMPs (see Attachment 6, Photographs 19, 20, and 21). The University construction project manager explained to the EPA Inspection Team that a review of chemicals stored at the site is not conducted during his daily site visits.

e. A sheen was observed on standing water inside a concrete form located adjacent to Towson Run in the eastern portion of the project (see Attachment 6, Photograph 22).

f. Dewatering was occurring in the northwest section of the project adjacent to Towson Run in an area without vegetation. Turbid water was observed flowing down a vegetated side slope and through Super

Silt Fence into Towson Run, causing erosion of the slope (see Attachment 6, Photographs 23 through 27).

g. Erosion was observed along the side slope adjacent to Towson Run in the interior portion of the project. This resulted in sediment covering approximately half the height of the Super Silt Fence (see Attachment 6, Photograph 28).

Observation 13: Health and Counseling Center Project (November 7, 2013)

The Health and Counseling construction project is located at the intersection of Linthicum Drive and University Avenue (see Attachment 6, Photograph 29). The project consists of the redevelopment of a site that contained two university dorms and a roundabout. The first phase of the project, which had been completed, was to connect the University's utilities system (i.e., steam) to the buildings. The second phase of the project includes refurbishing the two buildings and constructing a structure connecting the two buildings. In addition, a stormwater management pond and a foundation planter were to be constructed.

According to the University's construction project manager, the project started in June 2012 and was expected to be complete in December 2013. At the time of the site visit it appeared that the connecting structure had been completed and the stormwater management controls had been partially constructed. A large portion of the site was disturbed.

According to the University's construction project manager, the site disturbance for the project was 0.928 acres. The University's construction project manager was not clear if the area of disturbance included both phases of the project or whether coverage under MDE's construction general permit had been obtained.

The University construction project manager explained that he typically visits the site daily to review construction activities. He further explained that erosion and sediment controls are one aspect of his responsibilities, as he is responsible for all aspects of construction activities (e.g., schedule, buildings, utilities, etc.). The University construction project manager stated that he typically conducts a daily site walk but that he may not review all areas where erosion and sediment controls are located. He also stated that he does not regularly document his site walk findings and that he primarily conveys erosion and sediment control issues to the site contractor verbally. He further stated that he does not review the site to ensure that proper permit coverage under MDE's CGP has been obtained or whether the site is in compliance with the requirements of MDE's CGP (i.e., regular inspections).

The EPA Inspection Team observed the following with regard to erosion and sediment controls at the construction site and verbally reviewed the observations with University representatives during the site visit:

a. The ends of repaired silt fence had been stapled together instead of being wrapped around a stake, and the repaired silt fence was not entrenched after repair (see Attachment 6, Photographs 30 and 31).

b. Sections of silt fence near a construction entrance on West Drive were overlapped instead of being wrapped around a stake (see Attachment 6, Photograph 32).

c. Perimeter controls along University Avenue were not installed in accordance with the erosion and sediment control plans and were degraded and broken (see Attachment 6, Photographs 33 and 34).

Observation 14: Power Plant (November 8, 2013)

The EPA Inspection Team visited the Site and Safety Project located near Cook Library and the Power Plant. The Project Manager stated that this 18 month project began in May 2013 and would be completed December 2014. The current segment would be complete late November 2013. Potts and Callahan were subcontractors on site to Whiting-Turner Contracting, Inc. A complete inspection of the construction project was not conducted; however, observations of the construction entrance indicated it was not properly stabilized, resulting in the tracking of sediment onto the sidewalk and roadway adjacent to the entrance in the vicinity of a roadway trench drain (see Attachment 6, Photographs 35 through 37).

Observation 15: Suggestions for Construction Site Stormwater Runoff Control Program Improvement

As indicated above, the EPA Inspection Team observed two of the University's construction project managers as they conducted routine oversight inspections at two construction sites within the University's jurisdiction. The EPA Inspection Team observed that the inspections focused only on erosion and sediment control. As a program improvement, the EPA Inspection Team suggested including a focus on other pollutants, such as petroleum products and other chemicals, in the inspection process in order to help identify environmental deficiencies that may be related to outside agency regulations and to provide added protection for the MS4 from all potential pollutants.

The EPA Inspection Team also suggested that the University could improve its construction site inspection program by including a review of the NPDES Construction General Permit status (if applicable), even though those reviews are not specific program requirements according to the Permit or COMAR.

The University did not have SOPs for conducting oversight inspections. Although it is not a specific Permit requirement, the EPA Inspection Team

suggested that the construction site oversight program could be improved by developing SOPs to make the inspection process more consistent for the construction project managers and to ensure the entire construction site is reviewed.

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM

Permit Section III.E. (Post-Construction Stormwater Management) – The Permit requires the University to adhere to Maryland Environment Article, Title 4, Subtitle 2, Annotated Code of Maryland, which establishes a statewide stormwater management program. This statute, coupled with COMAR, requires that stormwater management for new development and redevelopment be addressed for any proposed project that disturbs five thousand (5,000) square feet or more of earth.

COMAR 26.17.02.03 states that an acceptable stormwater management program will include 1) a Water Management Administration-approved stormwater management ordinance; 2) stormwater management planning and approval processes that provide stormwater management for every land development subject to COMAR 26.17.02, implementation of environmental site design (ESD) to the maximum extent practicable (MEP), and the ability and the information necessary to review adequately proposed installation and maintenance measures for stormwater management; and 3) inspection and enforcement procedures that ensure the proper construction and maintenance of approved stormwater management measures.

The EPA Inspection Team reviewed procedures related to the implementation of the requirements in both the Permit and COMAR, including tracking and reporting of the implementation of the *2000 Maryland Stormwater Design Manual* as well as identifying, conducting, and documenting maintenance inspections for stormwater management BMPs at the University. Site visits were used to verify these implementation procedures.

COMAR 26.17.02.10.C (Installation of Stormwater Management Facilities**)** requires inspections to be conducted during stormwater management facility construction.

Observation 16: Towson University's construction project managers did not have knowledge pertaining to the installation of stormwater management facilities. University construction project managers did not appear to be knowledgeable about post-construction BMPs planned for installation on their sites, and therefore did not appear to be vigilant regarding required contractor inspections or ensuring that these areas were protected from soil compaction and disturbance.

COMAR 26.17.02.11.C (Long-term Operation and Maintenance of Structural Stormwater Management Facilities) states that owners shall perform, or cause to be performed, preventive maintenance of all completed ESD treatment practices and structural stormwater management measures to ensure proper functioning. The responsible agency shall ensure preventive maintenance through inspections, occurring during the first year of operation and then at least once every three years, of all stormwater management systems.

Observation 17: During site visits to five aboveground stormwater management facilities (i.e., four ponds and one foundation planter) located throughout the University's campus, the EPA Inspection Team observed that post-construction BMPs were in various states of operation and some had not been maintained.

University representatives stated that a comprehensive inventory of post-construction BMPs had not been compiled. University representatives provided the EPA Inspection Team with a map that displayed 11 points (see Attachment 5, Exhibit 9) that they explained were the majority of underground BMPs located on campus, and this map had been developed as a result of their being notified of the EPA inspection. University representatives also provided a list of 10 underground BMPs (see Attachment 5, Exhibit 10). University representatives additionally provided page 5 from the University's 2006 *Stormwater Master Plan Report* (see Attachment 5, Exhibit 11), which features a table listing 13 existing stormwater management facilities. However, staff stated that this table was not comprehensive and that additional structures likely existed.

University representatives explained that stormwater management facilities had been installed on campus over the past 10 or so years and that oversight of BMP installation was left up to the University's contractors. They also explained that a final as-built inspection of the BMPs was conducted by the University's engineers and MDE, and that a final set of as-built drawings was provided to the University.

University representatives stated that they had not implemented a method to assign maintenance responsibility for existing and new BMPs. University staff explained that a newly installed foundation planter at the West Village Garage had a maintenance plan, and that three green roofs on campus had maintenance schedules and were maintained by a contractor. However, the majority of stormwater management facilities on campus did not have maintenance plans and specific maintenance requirements had not been developed.

University representatives explained that some inspections of underground stormwater management facilities had been conducted, but that they had not been documented. They stated they were struggling with the unique maintenance requirements for both above- and below-ground BMPs. Safely accessing underground components was also a concern.

University representatives stated that University personnel had not received training to understand proper operation and maintenance of BMPs, but that some ponds had received basic maintenance, such as mowing and aesthetic landscaping.

The EPA Inspection Team suggested that contracting inspection and maintenance activities for stormwater management facilities might allow for the most efficient, appropriate, and cost-effective methods to complete the maintenance.

Observation 18: University representatives explained that maintenance standards for specific BMPs had not been developed, and that they were in the process of determining what type of maintenance was required for each BMP. They also explained that University staff had not received training on how to determine properly functioning BMPs or how to determine when maintenance is required.

In addition, during the field portion of the inspection, University staff were not able to locate the stormwater pond at Newell Hall they thought existed, had difficulty locating the ponds at the Towsontown Garage, and were unsure of the ownership of the pond near the Gillcrest Gilchrist Hospice Center.

Post Construction Stormwater Management Facilities Site Visits Conducted as a Component of the Inspection – On November 7 and 8, 2013 the EPA Inspection Team conducted site visits at five University-owned and operated, post-construction stormwater management facilities within the jurisdictional boundaries of the University: (1) Gillcrest Gilchrist Hospice Center pond, (2) Public Safety Building BMP, (3) Unitas Stadium pond, (4) West Village Garage foundation planter, and (5) Towsontown Garage pond.

The purpose of the visits was to assess the University's inspection and maintenance of post-construction BMPs. Because of their relevance to the University's obligations for post-construction stormwater management under its MS4 permit, summary observations pertaining to the five site visits are presented below.

Observation 19: Post Construction Stormwater Management Facility – Gillcrest Gilchrist Hospice Center Pond (November 7, 2013)

The Gillcrest Hospice Center pond was located in the northwest corner of campus. University representatives were unsure whether this pond was actually owned by the University and stated that it might be owned by the Gillcrest Gilchrist Hospice Center, which is located up the hill from the pond.

The EPA Inspection Team observed the following with regard to maintenance of the stormwater management facility during the site visit:

a. A fallen tree was observed in the pond (see Attachment 6, Photograph 8).

b. Sediment and debris were observed in the inlet to the pond (see Attachment 6, Photograph 9).

c. A drainage pipe observed in the pond appeared to drain to Towson Run, on the opposite side of pond's earthen berm (see Attachment 6, Photographs 10 and 11).

d. An overflow spillway was observed. It appeared to drain to Towson Run (see Attachment 6, Photograph 12).

e. University staff could not provide design, installation, or operation and maintenance records (i.e., maintenance schedule and inspection records) to the EPA Inspection Team.

f. University staff stated that they were unsure if the pond had received inspection or maintenance in the past.

Observation 20: Post Construction Stormwater Management Facility – Public Safety Building Bioswale (November 8, 2013)

The Public Safety Building bioswale was located immediately east of the Public Safety Building. According to the Director of EH&S, the Public Safety Building was originally constructed in the 1960s or 1970s.The building was refurbished during 2012–2013;(Incorrect- EHS Director did not state this. The Public Safety Building is a newly constructed building. Construction commenced in 2012 and was completed/occupied in May, 2013); the bioswale was installed at that time and was completed in May 2013. The bioswale provides treatment primarily for stormwater runoff from the building and surrounding area (i.e., roof drains and parking area). It discharges to the separate storm sewer system located at the University.

The EPA Inspection Team observed the following with regard to maintenance of the stormwater management facility during the site visit:

a. Vegetation in the bioswale was well established and the bioswale appeared to be functioning properly (see Attachment 6, Photograph 38).

b. University staff could not provide design, installation, or operation and maintenance records (i.e., maintenance schedule and inspection records) to the EPA Inspection Team.

c. University staff stated that they were unsure if the pond had received inspection or maintenance since its installation in May 2013.

Observation 21: Post Construction Stormwater Management Facility – Unitas Stadium Post-Construction Pond (November 8, 2013)

The Unitas Stadium post-construction pond was located on Auburn Drive to the west of the stadium. According to the Director of EH&S (The Director did not make this statement; it was another University Staff person present that made the statement, the pond was constructed approximately 10–15 years prior to the EPA inspection. The pond provides treatment primarily for stormwater runoff from the stadium (mainly consisting of an athletic field and track). According to the Director of EH&S, (The Director did not make this statement; it was another University Staff person present that made the statement), the pond discharges to Towson Run, located several hundred yards to the southwest (see Attachment 6, Photograph 39).

The EPA Inspection Team observed the following with regard to maintenance of the stormwater management facility during the site visit:

a. The pond was observed to be overgrown with vegetation, including trees and leafy vegetation in the bottom of the pond and on the side slopes of the pond (see Attachment 6, Photographs 40, 48 and 49).

b. Erosion was observed on the side slope in the northeast corner and on the northern end of the pond, including around a sewer manhole structure (see Attachment 6, Photographs 41 through 43).

c. Sediment and debris were observed in the inlet located in the northern portion of the pond (see Attachment 6, Photographs 44 and 45).

d. Sediment and debris were observed in the inlet to the pond in the southeastern portion of the pond (see Attachment 6, Photograph 46). In addition, flow had formed a berm around the area, creating an uneven distribution of flow into the pond (see Attachment 6, Photograph 47).

e. The pond was constructed with an underdrain system and cleanout (see Attachment 6, Photographs 49).

f. University staff could not provide design, installation, or operation and maintenance records (i.e., maintenance schedule and inspection records) to the EPA Inspection Team.

g. University staff stated that they were unsure if the pond had received inspection or maintenance in the past.

Observation 22: Post Construction Stormwater Management Facility – West Village Garage Foundation Planter (November 8, 2013)

The West Village Garage foundation planter was located to the north of the parking garage in the northwest corner of the campus. According to the Director of EH&S, (The Director did not make this statement; it was another University Staff person present that made the statement) the planter was constructed approximately two years prior to the EPA inspection. The planter provides treatment primarily for stormwater runoff from the roadway surrounding the garage and the parking garage. According to the Director of EH&S, (The Director did not make this statement; it was another University Staff person present that made the statement) the planter discharges to Towson Run located immediately north of the garage.

The EPA Inspection Team observed the following with regard to maintenance of the stormwater management facility during the site visit:

a. Vegetation in the foundation planter was well established and the planter appeared to be maintained and functioning properly (see Attachment 6, Photograph 50).

b. University staff were able to provide design details, an operation and maintenance plan, and maintenance records to the EPA Inspection Team.

c. Towson University's aboveground BMP inventory (page 5 of the University's 2006 *Stormwater Master Plan Report*) did not appear to contain the foundation planter (see Attachment 5, Exhibit 11).

Observation 23: Post Construction Stormwater Management Facility – Towsontown Garage Pond (November 8, 2013)

The Towsontown Garage pond was located in the north-central portion of campus, between Towsontown Boulevard and University Avenue. According to the Director of EH&S, (The Director did not make this statement; it was another University Staff person present that made the statement) the pond was constructed 10 or more years prior to the EPA inspection. The pond provides treatment primarily for stormwater runoff from the parking garage. According the Director of EH&S, (The Director did not make this statement; it was another University Staff person present that made the statement) the pond discharges to Towson Run, which flows from east to west under a portion of the garage (see Attachment 6, Photograph 4).

The EPA Inspection Team observed the following with regard to maintenance of the stormwater management facility during the site visit:

a. University staff were unable to immediately locate the pond. Further, staff were unsure if the site consisted of one or two ponds; however, it appeared to the EPA Inspection Team that there was only one pond.

b. Towson University's aboveground BMP inventory (page 5 of the University's 2006 *Stormwater Master Plan Report*) did not appear to contain the pond(s) (see Attachment 5, Exhibit 11).

c. The pond was observed to be overgrown with vegetation, such as trees and leafy brush (see Attachment 6, Photographs 51 and 52).

d. Erosion was observed around a roof drain from the parking garage adjacent to the pond (see Attachment 6, Photograph 53).

e. University staff could not provide design, installation, or operation and maintenance records (i.e., maintenance schedule and inspection records) to the EPA Inspection Team.

f. University staff stated that they were unsure if the pond had received inspection or maintenance in the past.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING

Permit Section III.F. (Pollution Prevention and Good Housekeeping) – The Permit requires the University to implement and maintain pollution prevention and good housekeeping techniques and procedures to reduce pollutants from all facility operations.

Permit Section III.F. – The Permit requires the University to maintain employee training materials on preventing and reducing pollutant discharges to the MS4.

Observation 24: University representatives stated that the University had not developed a comprehensive plan to educate faculty, staff, and students. University representatives explained that the only employee training conducted

pertaining to stormwater was around 20 slides discussing stormwater as part of the hazardous waste generator training. They further stated that not all University employees were required to take the training. The aforementioned training slides pertaining to stormwater, along with training sign-in sheets, were provided to the EPA Inspection Team. University representatives stated that they were not aware of any additional training provided to staff.

A University faculty member explained that a number of student courses addressed stormwater issues. These included freshman level chemistry, biology, environmental science courses, a senior toxicology course, and a graduate level environmental science course.

Permit Section III.F. – The Permit requires the University to ensure all facility activities are properly permitted under NPDES or any other appropriate state or federal water pollution control program.

Observation 25: Section F.1. of the University's January 13, 2005 NOI states that the University will "make sure all agency 'industrial' facilities have NPDES general permit for stormwater."

University representatives stated that they had not determined whether University facilities were required to obtain specific permits from the state or federal governments, but that they were under the impression that they were not required to do so.

The MDE Industrial General Permit (02-SW) designates that department of public works and highway maintenance facilities are required to receive coverage under that permit.

The EPA Inspection Team suggested, based on the types of activities that were conducted at University facilities such as vehicle maintenance, University staff should further research whether additional permits such as 02-SW are required.

Permit Section III.F. – The Permit requires the University to develop pollution prevention or good housekeeping procedures themselves or to rely on another responsible entity to comply with this minimum control measure.

Observation 26: Section F.1. of the University's January 13, 2005 NOI states that the University will "generate a pollution prevention plan per general permit requirements." Further, Section F.2. states that Towson University will "develop pollution prevention options for all municipal property not covered by 'industrial' general permits."

University representatives stated that written pollution prevention or good housekeeping procedures had not been developed for University facilities,

but that staff implemented practices to prevent pollution and knew who to contact in case of spills or other pollution issues. University representatives further stated that staff at University facilities did not perform dedicated stormwater inspections of the facilities, but that staff were aware of stormwater concerns and walked through the facilities frequently.

The EPA Inspection Team suggested that site-specific SWPPPs or general BMP informational packets be developed for each of the University's facilities to provide the most site applicable and site specific information for employees. The EPA Inspection Team also suggested that University staff perform stormwater inspections of facilities and that they document the results of these inspections.

University Operations Facility Site Visits Conducted as a Component of the Inspection On November 8, 2013 the EPA Inspection Team conducted three site visits at University-owned facilities within the jurisdictional boundaries of the University. The purposes of the site visits were to document site conditions and to assess the University's oversight activities for University operation and maintenance. The EPA Inspection Team visited the following sites: (1) general services facility and (2) landscape services facility. Dry weather conditions were experienced during the inspection activities. Because of their relevance to the University's obligations for pollution prevention and good housekeeping for University operations under its Permit, summary observations pertaining to the general services facility and landscape services facility site visits are presented below.

Observation 27: University Facility – General Services Facility (November 8, 2013)

The general services facility is located on Towsontown Boulevard, Towson, Maryland. The facility houses storage and operations space for a number of University activities including fleet maintenance, HVAC, painting, key shop, road salting, and others. The facility consists of a large main building housing individual shop rooms, a salt storage barn, and two large dumpsters. University staff stated that vehicle washing takes place at two carwashes located off of campus.

Stormwater drainage from the facility flows to an outlet located on the southwest side of the site. The outlet drains to the MS4, and stormwater eventually discharges into Towson Run.

University staff explained that the facility was not covered under the MDE industrial general permit and that neither site-specific BMPs nor a SWPPP had been developed for the site.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the facility and verbally reviewed the observations with University representatives during the site visit.

a. Two floor drains located in the storage and staging area inside the main building were connected to the storm sewer (see Attachment 6, Photographs 54 and 55). University staff stated that the drains are connected to an outfall from the site to the MS4 along Towsontown Boulevard (see Attachment 6, Photograph 56). Paint and other chemicals were stored on shelves near the indoor floor drains (see Attachment 6, Photograph 57). The two floor drains have been sealed off.

Observation 28: University Facility – Landscape Services Facility (November 8, 2013)

The landscape services facility is located in the southwest portion of the campus. The facility consists of a shop building used for equipment storage and for minor repairs on equipment, fueling station, bulk storage shed, and an outdoor vehicle and equipment storage area (see Attachment 6, Photograph 58).

University staff explained that the facility was not covered under the MDE industrial general permit and that neither site-specific BMPs nor a SWPPP had been developed for the site.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the facility and verbally reviewed the observations with the University representatives during the site visit.

a. Stains were present under two pieces of equipment on the impervious surface in the yard (see Attachment 6, Photographs 59, 60, and 61). The facility representative stated that regular informal inspections of the area include checking for significant leaks from equipment, but documentation of the inspections is not maintained.

PERMIT SECTION V.C.: REPORTING

Permit Section V.C. (Reporting) – The Permit requires the University to submit a report to MDE annually using the annual reporting form provided in Appendix E of the Permit. The report should contain the following information:

1. The status of compliance with Permit conditions, an assessment of the appropriateness of the identified BMPs, and a description of progress toward achieving the identified measurable goals for each of the minimum control measures.

2. Results of information collected and analyzed, including monitoring data if any, during the annual reporting period.

3. A summary of the stormwater activities the University plans to undertake during the next annual reporting period.

4. A change in any identified measurable goals (described in Appendix C of the Permit) that apply to the minimum control measures.

5. A description of the coordination efforts with other agencies regarding the implementation of the minimum control measures, including the status of any MOU or other agreement executed between the University and another entity.

6. A fiscal analysis of capital and operating expenditures to implement the minimum control measures.

Observation 29: As previously mentioned, Towson University representatives stated that the University had not submitted annual reports for its MS4 program since obtaining coverage under the Permit in October 2005. The University is currently at the beginning of MS4 Permit Year 9 (i.e., October 2005 to November 2013).